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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GEORGE KLEINMAN and SHERRI
KLEINMAN.

Plaintiffs,

vs.
WELLS FARGO N.A., a corporation, and
DOES 1-50

Defendants.

Case No. 3:22-cv-00407-LRH-CLB

**ORDER GRANTING
STIPULATION TO EXTEND
TIME FOR PLAINTIFFS TO
AMEND COMPLAINT**

(First Request)

Plaintiffs George Kleinman and Sherri Kleinman (“Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) (collectively, the “Parties”) stipulate to extend the time for Plaintiffs to amend their complaint and for Wells Fargo to file its response as follows:

^{1.} Wells Fargo filed a Motion to Dismiss on November 11, 2022. ECF No. 7.

2. The current deadline for Plaintiffs to amend their complaint as a matter of course under Federal Rule of Civil Procedure 15(a)(1)(B) is currently December 5, 2022, which is 21 days from November 14, 2022, the first court day following Wells Fargo’s Motion to Dismiss.

3. The Parties agree to extend the time for Plaintiffs to file an amended complaint as a matter of course by fourteen (14) days, up to and including December 19, 2022.¹

¹ The current deadline for Plaintiffs to respond to the Motion to Dismiss is November 28, 2022, which is 14 days from November 14, 2022. See LR 7-2. Because Plaintiffs intend to amend their

1 4. The deadline for Wells Fargo to respond to an amended complaint filed on
2 December 19, 2022 under Federal Rule of Civil Procedure 15(a)(3) would be January 3, 2023.

3 5. The Parties agree to extend the time for Wells Fargo to file its response to Plaintiffs'
4 amended complaint by fourteen (14) days, up to and including January 17, 2023, which date will
5 be the applicable deadline even if Plaintiffs file their amended complaint before December 19,
6 2022.

7 6. This request is made in good faith and not for the purpose of delay. The Parties
8 have agreed to accommodate respective counsel's and clients' scheduling limitations posed by the
9 Thanksgiving and winter holidays. Additionally, one counsel for Wells Fargo resigned effective
10 today, November 22, 2022 and is being replaced by a different attorney, which will necessitate time
11 for transition. *See* ECF No. 8 (Mot. to Remove Attorney from Electronic Service List).

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complaint as a matter of course, the Parties agree that Plaintiffs need not file a response to the Motion by November 28. If, however, Plaintiffs do not file an amended complaint, they must alternatively respond to the Motion by the same December 19, 2022 deadline.

7. In sum, the Parties agree and request that Plaintiffs' deadline to file an amended complaint as a matter of course is extended to December 19, 2022, and Wells Fargo's deadline to respond to the amended complaint will be January 17, 2023.

IT IS SO STIPULATED.

Dated: November 22, 2022

BRADLEY PAUL ELLEY, ESQ.

By: /s/ Bradley Paul Elley
Bradley Paul Elley, Esq.
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*Attorneys for Plaintiffs George and
Sherri Kleinman*

Dated: November 22, 2022

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ORDER

IT IS SO ORDERED.

DATED: this 22nd day of November, 2022.

UNITED STATES MAGISTRATE JUDGE